

**Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services**

STATEMENT OF BASIS

**Fiberglass Solutions, LLC
Fiberglass Manufacturing Facility
Harvey, Jefferson Parish, Louisiana
Agency Interest Number: 152632
Activity Number: PER20070001
Proposed Permit Number: 1340-00327-V0**

I. APPLICANT

Company:

Fiberglass Solutions LLC
14174 Hwy 43
Seneca, Missouri 64865

Facility:

Fiberglass Manufacturing Facility
2800 Peters Rd
Harvey, Jefferson Parish, Louisiana
Latitude 29° 52' 10", Longitude 90° 4' 1"

II. FACILITY AND CURRENT PERMIT STATUS

Fiberglass Solutions LLC is submitting an application to the Louisiana Department of Environmental Quality (LDEQ) for a construction and Part 70 operating air permit for a fiberglass manufacturing facility in Harvey Parish.

This is the initial Part 70 operating permit for the facility.

Permit No.	Unit or Source	Date Issued
1340-00327-V0	FUG 1	pending

**Fiberglass Solutions LLC
Fiberglass Tank Manufacturing Facility
Harvey, Jefferson Parish, Louisiana
Agency Interest Number: 152632**

III. PROPOSED PROJECT/PERMIT INFORMATION

Application

A permit application was submitted on August 27, 2007 requesting an initial Part 70 operating permit. Additional information dated August 30, 2007, September 10, 2007, September 28, 2007, October 3, 2007, and November 15, 2007 was also received.

Project

This permit is for a fiberglass tank manufacturing facility. It involves a single, fugitive point source which represents the entire manufacturing warehouse. The warehouse has three exhaust fans. All pertinent contaminants are released into the atmosphere through resin, paints and gel coats used throughout the manufacturing process. They are applied through the use of a mechanical non-atomized spraying device and a filament winding process. The air emission contaminants of interest are styrene, xylene, methyl benzene, methyl ethyl ketone, bis (ethylhexal) Phthalate, and PM10 particulate matter. All particulate matter is introduced through the use of a grinder/sander.

Proposed Permit

Permit 1340-00327-V0 will be the initial Part 70 operating permit for the fiberglass tank manufacturing facility.

Permitted Air Emissions

Estimated emissions in tons per year are as follows:

<u>Pollutant</u>	<u>Emissions in tons per year</u>
PM ₁₀	21.10
SO ₂	-
NO _x	-
CO	-
VOC	97.72

**Fiberglass Solutions LLC
Fiberglass Tank Manufacturing Facility
Harvey, Jefferson Parish, Louisiana
Agency Interest Number: 152632**

IV REGULATORY ANALYSIS

The applicability of the appropriate regulations is straightforward and provided in the Specific Requirements section of the proposed permit. Similarly, the Monitoring, Reporting and Recordkeeping necessary to demonstrate compliance with the applicable terms, conditions and standards are also provided in the Specific Requirements section of the proposed permit.

Applicability and Exemptions of Selected Subject Items

XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source		
ID No:	Requirement	Notes
FUG 1	Control methods for organic solvents [LAC 33:III.2123]	EXEMPT. Facility emits less than 100 tons of organic solvents. Controls beyond those specified in 40 CFR 63 Subpart WWWW are not feasible.

Prevention of Significant Deterioration/Nonattainment Review

PSD/non-attainment review is not required.

Streamlined Equipment Leak Monitoring Program

Not Applicable.

MACT Requirements

Fiberglass Solutions, LLC is a major source of toxic air pollutants (TAPs) pursuant to LAC 33:III.Chapter 51.

Fiberglass Solutions, LLC shall comply with the provisions set forth under New Source Performance Standards (NSHAP) 40 CFR 63, Subpart WWWW – Reinforced Plastic Composites Production.

Fiberglass Solutions LLC
Fiberglass Tank Manufacturing Facility
Harvey, Jefferson Parish, Louisiana
Agency Interest Number: 152632

Air Quality Analysis

Dispersion Model Used: ISC

Pollutant	Time Period	Calculated Maximum Ground Level Concentration	Louisiana Toxic Air Pollutant Ambient Air Quality Standard or (National Ambient Air Quality Standard {NAAQS})
Styrene	8 - hr	1407.80 $\mu\text{g}/\text{m}^3$	5070.00 $\mu\text{g}/\text{m}^3$

General Condition XVII Activities

The facility will comply with the applicable General Condition XVII Activities emissions as required by the operating permit rule. However, General Condition XVII Activities are not subject to testing, monitoring, reporting or recordkeeping requirements. For a list of approved General Condition XVII Activities, refer to the Section VIII – General Condition XVII Activities of the proposed permit.

Insignificant Activities

All Insignificant Activities are authorized under LAC 33:III.501.B.5. For a list of approved Insignificant Activities, refer to the Section IX – Insignificant Activities of the proposed permit.

V. PERMIT SHIELD

No permit shields have been requested for the proposed permit.

VI. PERIODIC MONITORING

Equipment/operational data recordkeeping by electronic or hard copy annually. Collect and keep records of resin and gel coat use, organic HAP content, and operation where the resin is used, if meeting any organic HAP emissions limits based on an organic HAP emissions limit in 40 CFR 63 Subpart WWW Tables 3 or 5, or if meeting any organic HAP content limits in 40 CFR 63 Subpart WWW Table 7 if averaging organic HAP contents. Subpart WWW. [40 CFR 63.5895(c)]

VII. GLOSSARY

Carbon Monoxide (CO) – A colorless, odorless gas, which is an oxide of carbon.

Maximum Achievable Control Technology (MACT) – The maximum degree of reduction in emissions of each air pollutant subject to LAC 33:III.Chapter 51 (including a prohibition on such emissions, where achievable) that the

**Fiberglass Solutions LLC
Fiberglass Tank Manufacturing Facility
Harvey, Jefferson Parish, Louisiana
Agency Interest Number: 152632**

administrative authority, upon review of submitted MACT compliance plans and other relevant information and taking into consideration the cost of achieving such emission reduction, as well as any non-air-quality health and environmental impacts and energy requirements, determines is achievable through application of measures, processes, methods, systems, or techniques.

Hydrogen Sulfide (H₂S) – A colorless inflammable gas having the characteristic odor of rotten eggs, and found in many mineral springs. It is produced by the reaction of acids on metallic sulfides, and is an important chemical reagent.

New Source Review (NSR) – A preconstruction review and permitting program applicable to new or modified major stationary sources of air pollutants regulated under the Clean Air Act (CAA). NSR is required by Parts C (“Prevention of Significant Deterioration of Air Quality”) and D (“Nonattainment New Source Review”).

Nitrogen Oxides (NO_x) – Compounds whose molecules consist of nitrogen and oxygen.

Organic Compound – Any compound of carbon and another element. Examples: Methane (CH₄), Ethane (C₂H₆), Carbon Disulfide (CS₂)

Part 70 Operating Permit – Also referred to as a Title V permit, required for major sources as defined in 40 CFR 70 and LAC 33:III.507. Major sources include, but are not limited to, sources which have the potential to emit: ≥ 10 tons per year of any toxic air pollutant; ≥ 25 tons of total toxic air pollutants; and ≥ 100 tons per year of regulated pollutants (unless regulated solely under 112(r) of the Clean Air Act) (25 tons per year for sources in non-attainment parishes).

PM₁₀ – Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers as measured by the method in Title 40, Code of Federal Regulations, Part 50, Appendix J.

Potential to Emit (PTE) – The maximum capacity of a stationary source to emit any air pollutant under its physical and operational design.

Prevention of Significant Deterioration (PSD) – A New Source Review permitting program for major sources in geographic areas that meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. PSD requirements are designed to ensure that the air quality in attainment areas will not degrade.

**Fiberglass Solutions LLC
Fiberglass Tank Manufacturing Facility
Harvey, Jefferson Parish, Louisiana
Agency Interest Number: 152632**

Sulfur Dioxide (SO₂) – An oxide of sulfur.

Sulfuric Acid (H₂SO₄) – A highly corrosive, dense oily liquid. It is a regulated toxic air pollutant under LAC 33:III.Chapter 51.

Title V Permit – See Part 70 Operating Permit.

Volatile Organic Compound (VOC) – Any organic compound, which participates in atmospheric photochemical reactions; that is, any organic compound other than those, which the administrator of the U.S. Environmental Protection Agency designates as having negligible photochemical reactivity.